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ABSTRACT

This document contains the analysis of public responses to two focus papers published in the Federal Register (October 14, 1988 and January 25, 1989) regarding the U.S. Department of Labor's Apprenticeship 2000 initiative, the purpose of which is to determine the future role of apprenticeship in meeting needs for a skilled work force. The document's introduction states the key questions regarding the future of apprenticeship in the United States posed in the focus papers. It also describes the respondents who commented on the focus papers. Part 1 of the document reports the responses to the two key questions posed in the first focus paper. (One question sought opinion about whether the apprenticeship concept should be expanded and about three alternative approaches for recognizing skill achievement for the completion of an apprenticeship program. The other question addressed quality measurement and asked for appropriate process and outcome measures to ensure high quality training in future apprenticeship programs.) Among the issues discussed in part 1 are program structure and quality standards. Part 2 reports the responses to the second focus paper, which sought ways to expand the apprenticeship model significantly. Among the issues discussed in part 2 are support activities that might overcome barriers to training, the degree to which strengthened or additional linkages are needed to improve or expand apprenticeship programs, and ways the federal/state apprenticeship systems might be strengthened. (CML)

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APPRENTICESHIP 2000

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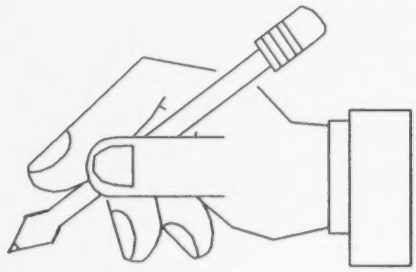
SUMMARY . REPORT OF FOCUS PAPERS



U.S. DEPARTMENT OF LABOR

EMPLOYMENT AND TRAINING ADMINISTRATION

AUGUST 1989

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SUMMARY REPORT OF RESPONSES TO APPRENTICESHIP 2000 FOCUS PAPERS

INTRODUCTION

In December 1987, the Department of Labor (DOL) launched its Apprenticeship 2000 initiative with the publication of an issue paper in the Federal Register, 52 FR 45904 (December 2, 1987). The purpose of this initiative is to review the apprenticeship concept to determine its future role in meeting America's needs for a skilled work force. Publication of that issue paper was followed by three public meetings held during February 1988, in San Francisco, Chicago, and Washington, D.C. The meetings were announced in the Federal Register, 53 FR 961 (January 14, 1988), and the public was invited to attend and testify on the issues presented in the issue paper.

The results of the written responses and oral testimony were summarized and published by the DOL in August 1988, in a report entitled, APPRENTICESHIP 2000: THE PUBLIC SPEAKS. These responses were analyzed in order to provide direction for the next stages of the apprenticeship review. Concurrently, a research program was announced as a notice in the June 3, 1988, Federal Register, 53 FR 20386. This program included both short and long term research. Thirteen specific topics for the shorter term research and 5 long term projects were identified and announced. These topics support the basic policy objectives for the apprenticeship review. In addition, the DOL is undertaking a review of the basic authority for the national apprenticeship system -- the legislation and regulations.

Within the Employment and Training Administration, Bureau of Apprenticeship and Training (BAT) officials have also been meeting with key business, labor, education and special interest group representatives to discuss the apprenticeship review. Another part of this on-going review was the publication of two focus papers that were published for public comment in the Federal Register. These papers presented a wide range of options for expansion and change of the apprenticeship system and solicited public input on an array of issues which impact upon apprenticeship.

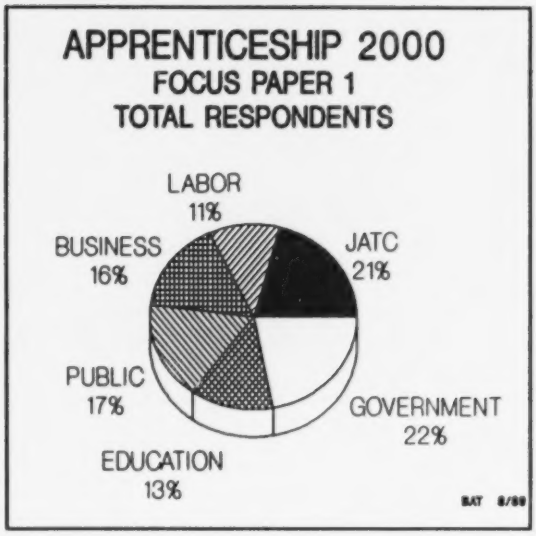
The first focus paper published in the Federal Register, 53 FR 40326 (October 14, 1988), posed two key questions regarding the future of apprenticeship in America. The first question concerned expansion of the apprenticeship *concept* of training to other areas, including such areas where the traditional models may not apply. The second question addressed quality measurement, and solicited responses on appropriate process and outcome measures to ensure quality training in future apprenticeship programs. As of March 31, 1989, there were 101 respondents to the Focus Paper on Expansion and Quality.

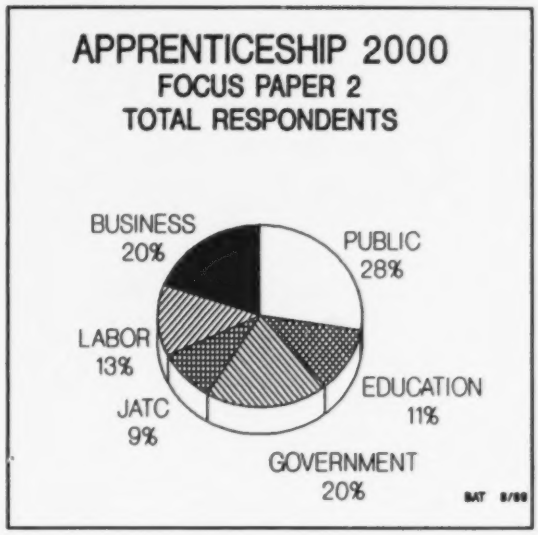
The second focus paper published in the Federal Register, 54 FR 3756 (January 25, 1989), assumed that some significant level of expansion of the apprenticeship model would occur, and questioned how best to accomplish such expansion. Public comment was sought on the appropriate support and linkage activities necessary for effective expansion of apprenticeship. Comment was also sought on how these activities should be organized and carried out with respect to the Federal/State roles. As of April 28, 1989, there were 87 respondents to the Apprenticeship 2000 Focus Paper on Support Activities, Linkages, and Federal/State Roles.

The comments received for each paper were reviewed, coded, and analyzed by BAT staff. Many commentators responded quite broadly to some or all of the issues, while others responded only indirectly. Thus, the analysis of the opinions cannot be a precise count, but is instead an indication of the relative frequency of the views expressed by respondents.

The charts below show, for each Focus Paper, the interest groups represented by the respondents. The major respondent groups were:

- Business and Industry, including individual employers and associations;
- Labor Unions, including both international and local unions;
- Joint Apprenticeship and Training Committees (JATC), the labor management committees that administer apprenticeship programs for an employer or group of employers;
- Government;
- Education, including government educational agencies and schools; and
- Public/Special Interest Groups, including individuals and associations.





Following is a summary and analysis of the responses to the two focus papers. Part I is the report on the responses received to Focus Paper 1, and Part II is the report on the responses received to Focus Paper 2.

Findings from all phases of the apprenticeship review will be used in formulating a policy report containing findings and recommendations. This report will be published and widely distributed.

PART I

Apprenticeship 2000 Focus Paper
On Expansion and Quality

ISSUE I - PROGRAM STRUCTURE

INTRODUCTION

Issue I included several categories relating to expansion of the concept and definition of apprenticeship, and on alternative approaches for recognizing skills attained through apprenticeship.

Most of the respondents supported some form of expansion of apprenticeship. There was strong support for recognizing varying levels of skill achievement for training received, as well as support for diversifying the structure of apprenticeship programs to accommodate the industry's needs. All groups, especially employers, expressed the opinion that any expansion must insure quality training, and that the two should go hand in hand.

There were many ideas for expansion expressed other than direct responses to the issues raised in the focus paper. For instance, one of the recurring expansion themes was promotion. Many respondents suggested an aggressive informational marketing and public relations plan. Some responded that all parties should be made aware of the benefits of apprenticeship. Others commented that schools and counselors are ill-informed about apprenticeship from middle schools right up through college level. Many thought that employers also should be made aware of how apprenticeship can help overcome the skilled worker shortages they presently have, and will face increasingly, in the future.

Another recurring reply was that industry should have a key role in apprenticeship expansion. Some respondents suggested a concentrated effort to interface labor, business, industry, government, and education to improve our skilled work force. Those who made this proposition also generally felt that the expansion should be primarily industry driven. Some expressed concerns about the BAT's present ability to effectuate expansion efforts, given the current fiscal constraints.

Specific suggestions for encouraging expansion included:

- o Consistent Federal/State coordination;
- o Greater flexibility in training programs;
- o A national database of designed programs and curriculums;
- o Employer incentives such as tax credits or other monetary assistance;
- o Coordination with education/vocational education (including college credit); and
- o Using the JATC as a model mechanism for the expanded apprenticeship system.

Some also expressed specific concerns. For instance, excessive paperwork, government intervention, and the possibility of fragmenting trades during expansion efforts were areas of concern for some. The issue of paperwork was thought to be especially a problem for smaller employers who usually have a limited staff. On government intervention, one respondent remarked that apprenticeship should grow, not government.

DEFINITION OF APPRENTICESHIP

Public comment was sought on the feasibility of structuring program models based on a "core definition" of apprenticeship. The core definition of apprenticeship proposed in the focus paper was, "structured on-the-job training combined with related theoretical instruction." Of the total respondents, 46 percent conveyed opinions on the definition of apprenticeship.

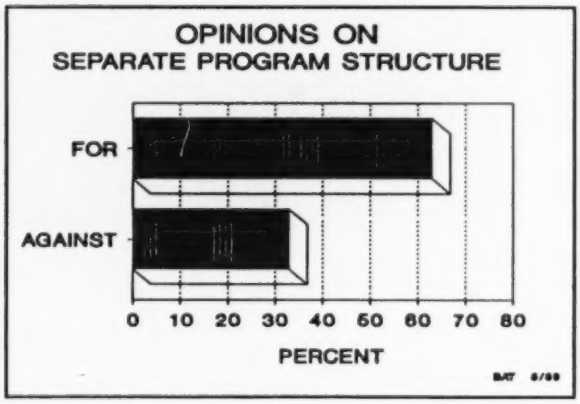
Respondents were generally in favor of this definition with some qualifiers, additions and suggestions. A few respondents stressed the importance of the on-the-job training component. However, some thought the definition was too broad; while others thought the BAT should concentrate on a practical definition promoting skill improvement and problem-solving ability.

The predominant qualifier to the definition of apprenticeship was "under the guidance of a skilled craftsperson." In this connection, some emphasized the benefits of mentoring (old/young) and the transfer of knowledge in the traditional apprenticeship learning model. Many mentioned the need for a training contract between the apprentice and the employer.

APPROACHES FOR RECOGNITION

Focus Paper 1 proposed three alternative approaches for recognizing skill achievement from the completion of an apprenticeship program. The three approaches were: creating a separate program structure, varying program levels, and enhancing worker certification (transcripting).

1. Separate Program Structure



Comments were requested on an alternative to create a separate program structure for all skill training that does not easily "fit" into the traditional apprenticeship model. Forty-six percent of the respondents expressed opinions on the separate program structure issue, and, of those, 63 percent were favorable.

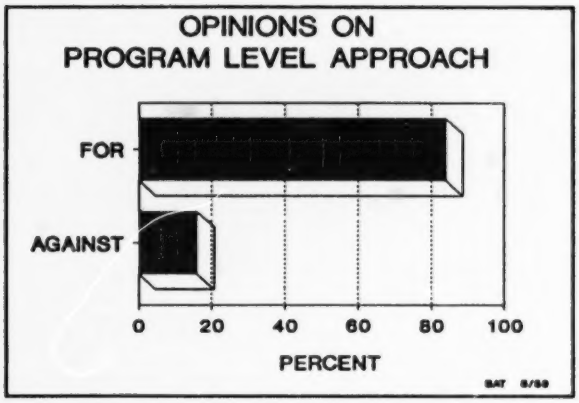
Many of the affirmative responses specified that alternative program structures should be initiated in non-traditional apprenticeable occupations. Others mentioned potential target occupations for a new program structure, such as in the medical fields, or in preventive maintenance. Respondents in favor of alternative structures were generally seeking greater flexibility in apprenticeship training, and acknowledging that all skilled training does not easily fit into the present model. Many respondents supported career path capabilities, and allowing steps for upgrading. Those responses opposed to separate structure were largely concerned about fragmenting the current trades, that is, training for a specific skill rather than multi-skilled broad occupational training.

There was also a question as to whether a new structure should be termed "apprenticeship." The few who responded to this question generally favored changing the name so as not to confuse the training with traditional apprenticeship. Internship or technician were mentioned as possible terms.

2. Program Levels

Comment was requested on a proposal for establishing defined levels of skill attainment within the apprenticeship structure. Each level of completion would then be accorded recognition. Fifty-nine percent of the total respondents expressed opinions on establishing program levels in apprenticeship. Of those, 85 percent of the opinions were in favor of the program level approach.

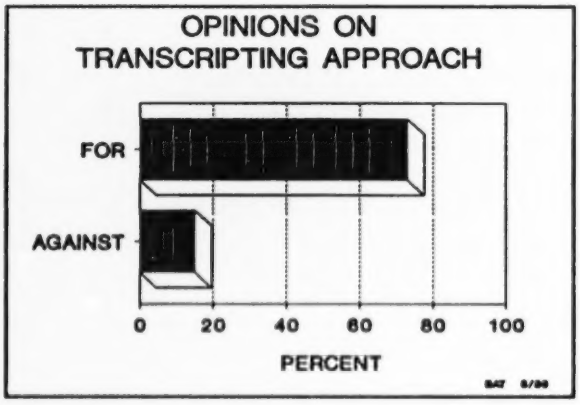
About half the respondents mentioned the need for journeymen (or upgrade) training when commenting on program levels. Some commentators said that recognition for these workers is a good place to start the expansion of apprenticeship. Others suggested that changing technology necessitates upgrade recognition for certain trades.



Several commented on using skill levels to provide career ladder opportunities with industry playing a key role in the determination of various skill levels. One respondent suggested a progression from apprentice on through technician, journeyworker, master craftworker, and on to artisan, depending on the length and extent of the training.

3. Worker Certification

Comment was requested on the feasibility of issuing a transcript of course work completion and skill competencies, along with the recognition of training completion. This transcript could be periodically updated as new skills are acquired. Fifty-five percent of the respondents commented on this approach, and 73 percent of those opinions favored the transcripting approach.



Comments made in connection with the proposal for issuing transcripts included the following.

- Industry should have a key role in determining competency requirements.
- Versions of transcripting already exist in some States.
- Certain related instruction courses should be interchangeable with college credits in working towards a degree.

The concerns expressed about transcripting generally related to the burdening of employers with too much paperwork. One respondent said transcripting is unreliable because there is no assurance of the level of quality.

ISSUE II - QUALITY

INTRODUCTION

Issue II addressed the process and outcome measures necessary for ensuring quality in apprenticeship and other work-based programs. This concern about quality in apprenticeship arose from comments received in response to the initial Apprenticeship 2000 publication in the Federal Register on December 2, 1987, and also at the three public meetings held in early 1988. In an effort to address this issue in more depth, specific comments were solicited on quality measurement and determination in apprenticeship, and other work-based programs.

The need for quality in apprenticeship was emphasized throughout the responses. The majority of respondents felt that there should be some quality standards, but opinions differed as to whether government, national industry, or the program sponsor should develop these standards. A number of respondents had specific suggestions to make on enhancing quality efforts. Some of the suggestions included:

- Forming a coalition of various constituencies to promote and modernize apprenticeship (similar to the National Alliance of Business);
- Establishing joint committees which would set the standards and curricula in each field; and
- Soliciting feedback from completers on program improvement.

STANDARD DEFINITIONS OF QUALITY

Public comment was sought on whether there can, or should be, a standard definition of quality for all programs. Thirty-one percent of the total respondents expressed opinions on this question. Of those, 61 percent were in favor of establishing a standard definition of quality for apprenticeship programs.

While most respondents thought that there should be a standard definition of quality, ideas on how to create this definition, and at what level, varied. Some stated that quality should be defined through national standards. Others suggested quality is best determined on a local level by the individual program sponsors. Outcome measures were also mentioned as a standard quality measure. Those opposed to standard definitions stated either that there was no need, or that quality was impossible to define.

PROCESS MEASURES

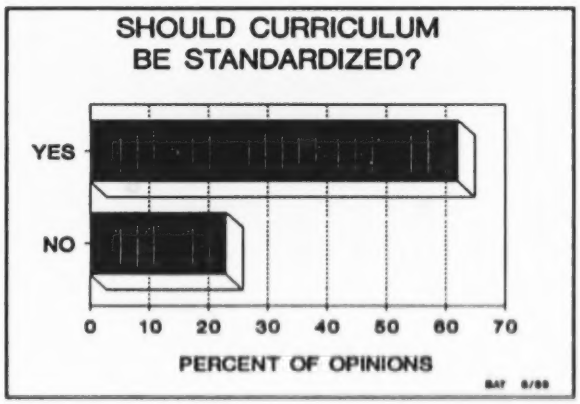
Comment was requested on a number of possible process measures for quality in apprenticeship programs. Process was defined to include both the program development and the on-going training that follows both on and off the job.

1. Program Development

Public comment was requested on three separate areas related to program development -- curriculum, work process, and periodic assessment.

a. Curriculum

Comment was sought on whether standard curricula are required to produce consistent high quality instruction, nationwide. Fifty-two percent of the respondents commented on this approach. Of those, 62 percent favored standardized curriculum while 23 percent were opposed. Fifteen percent expressed no preference but rather made general comments.



Most of those who thought that there should be standardized curricula indicated that the standard should be set at a minimum level. Many mentioned the importance of industry's role in the development of standards. Many commentators also thought that curricula should be constant by trade or occupation. Those opposed to standardization either centered on the need to tailor the training to the sponsor's needs, or on the geographical differences that influence training needs.

Other comments included:

- Establishing a Spanish based curriculum;
- Developing model curricula but not requiring its standardization;
- Giving consideration to variations in individual learning styles;
- Forming cooperative agreements with universities; and
- Using a modular training format.

Comment was also sought on whether the length of related instruction should vary for different occupations and industries. Twenty-two percent of the respondents commented on this suggestion, with 96 percent of those favoring varying the length of related instruction training.

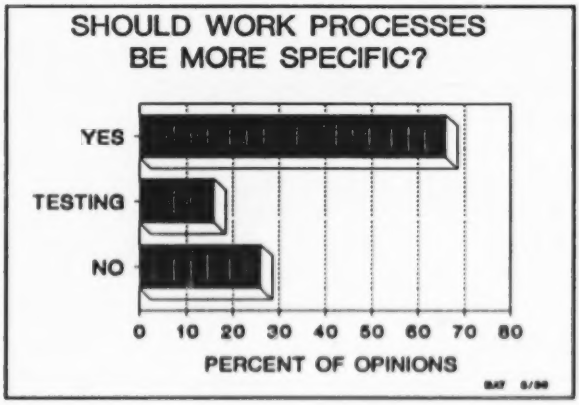
The kinds of comments received in response follow.

- o The variance in hours of related instruction should occur by trade or occupation.
- o There should be a minimum level by trade.
- o A greater number of hours of instruction than the current recommended minimum of 144 hours is needed, especially for technologically advanced trades.

In general, there was considerable support for more flexibility in related instruction hours; in some cases more than 144 hours were suggested to ensure greater quality; in others less than 144 to accommodate occupations that require less classroom activity.

b. Work Processes

Comments were requested on whether program standards for work processes should be more specific. Current federal regulation requires an outline of work processes in which the apprentice will receive supervised work experience and on-the-job training. These work processes are a condition for program registration and approval. Half of the respondents expressed opinions on the work processes issue, with 66 percent of these opinions favorable.



In addition, 16 percent expressed support for some type of testing for the apprentices in the various processes. Some mentioned establishing specific competency levels or tests to determine occupational proficiency. Others supported final testing as a procedure to determine occupational competency.

A few respondents expressed concern that some aspects of the trade may not be encountered in a particular time period, or by a particular employer. Another concern was about the apprentice receiving the proper on-the-job training rotations when the employer's facilities cannot accommodate the proper training for the particular trade. However no solutions were offered.

c. Periodic Assessment

Comment was sought on whether periodic assessment of curricula should be built into program standards and, if so, should the requirements be uniform or left up to the individual sponsor. Forty-five percent of the respondents commented on this question. Of those, 84 percent favored some form of periodic assessments.

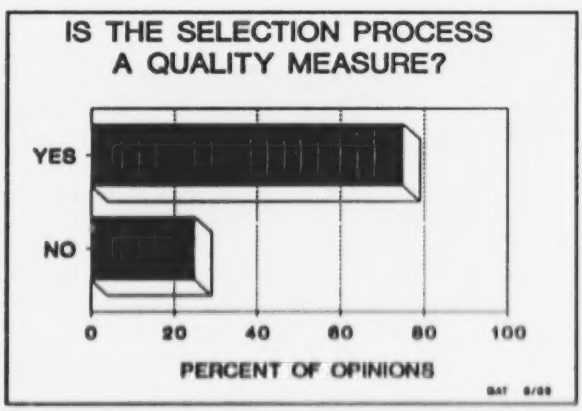
While the overall response to having periodic assessment was favorable, there were many qualifiers to individual responses. For instance, many of those in favor also said that the assessment should be based on the sponsor's needs rather than tied to rigid standards. Several commentators said that the BAT should do everything it can to assist the sponsor in facilitating quality trade training. A number of respondents emphasized encouraging as much self governing by industry as possible, especially given BAT's staffing constraints.

2. Training Apprentices

Public comment was requested on three areas that relate to training apprentices -- selection of apprentices, ratio of apprentices to journey level workers, and qualifications of instructors.

a. Selection of Apprentices

Comment was sought on whether the process of selecting apprentices should be included in program quality measurement. Comment was also sought on how to take into account affirmative action goals. Fifty-one percent of the respondents had opinions on the selection process. A large majority responded favorably to the importance of the apprenticeship selection process.



There was a diversity of answers to the selection question. Concerns that the program's affirmative action goal be maintained were expressed frequently in response to this issue. Typical comments included the following.

- The candidates interest and ability should have more weight than past experience.

- Vocational education could possibly assist in achieving affirmative action goals.

- o The selection process should include counseling to help the apprentice cope with low wages, travel, and marital problems that may occur.

- o The exams which give undue weight to past experience have a negative impact on women and minorities.

b. Ratio of Apprentices To Journeyworkers

A question was raised about whether the ratio of apprentices to journey level workers is an effective measure of program quality. Comment was also sought on other measures or processes which would better assure safety and training goals. Sixty-one percent of the respondents expressed opinions on the ratio issue. While many of the respondents did not address the quality part of the ratio question, the majority of the opinions expressed were in favor of some type of ratio requirements.

There were many specific comments on this subject. In support of ratios, one respondent said that the ratio curbs the abuses that would run rampant in its absence. Another commentator supported the ratio requirements, but added that it must be enforceable. One reply stated that the ability and the interest of the journey level worker is more important than the ratio.

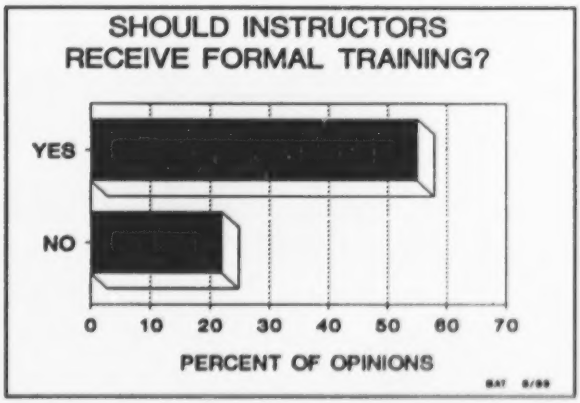
A few respondents were concerned about training too many apprentices when the permanent jobs are not there. In this connection, one respondent said that if ratios are used, they should be based on the Bureau of Labor Statistics occupational projections of that area. Some mentioned that the training process should be "under the direct supervision of journeymen," while one respondent suggested assigning an apprentice to one specific journeyworker.

A number of suggestions were made about determining the proper ratio. A few respondents commented that the sponsor should decide according to the particular training capabilities. Another mentioned the fact that the job site ratio is what is important. Many suggested specific numerical ratios ranging from 1 to 1, to 3 to 1 (journeyworkers to apprentices) needed to ensure quality.

c. Instructor Qualifications

Comment was sought on whether the quality of apprenticeship programs would be enhanced if all the apprentice instructors received formal teacher training. Comment was also sought as to whether current certification requirements are sufficient. Sixty-five percent of the respondents had opinions on instructor qualifications. Of those responses, 55 percent had favorable opinions on formal training for apprenticeship instructors.

In responding affirmatively, many commentators specified a minimum level. Some mentioned that funding for training should be made available by the government. A few respondents commented that their States already require instructor training. One commentator stated "we want the best instructors, but it is difficult to send them to instructor school every year." Those against requiring instructor training generally felt that the decision should be left up to the sponsor. Several other respondents specifically said that teacher training should be encouraged, but not mandated.



Thirty-seven percent of the respondents had opinions on minimum standards for related training instructors. About 60 percent of those responses favored minimum standards. However, some mentioned that existing State standards are sufficient at present. Others felt that related training instructors should be journeyworkers in the particular trade. Some thought they should be judged by industry standards. While opinions of those opposed varied, many said that work-related experience is more important than educational qualifications.

d. Recordkeeping

Comments were sought on the importance of a minimum level of recordkeeping and on what records should be kept. Forty-seven percent of the respondents had opinions on recordkeeping. Almost all of those opinions supported a minimum level of recordkeeping.

While there was general agreement that recordkeeping is necessary, commentators varied as to what records should be kept. Many respondents said that records should be kept to a minimum, so as not to overburden employers with paperwork (especially smaller employers). The list of suggested records includes: hours worked; related instruction hours; on-the-job training received; competencies achieved; courses taken; attendance; safety instruction; selection records; agreement cards (indenture); completion records; cancellations (and reasons); skills taught; monthly progress reports; test grades; and supervisor evaluations.

OUTCOME MEASURES

Public comment was invited on possible outcome or success measures for apprenticeship programs. Included in this category were skills competency and completion rates.

1. Skills Competency

Comment was sought on whether required competency tests would contribute to quality in apprenticeship. Forty-eight percent of the respondents commented on this question. About three-quarters of those opinions favored some type of competency measures, and 25 percent specifically mentioned individual competency testing.

The affirmative answers included comments such as the following.

- Competency levels should be developed by industry.
- There should be certain benchmarks within an occupation.
- Examine final testing for the particular trade.

A few used the terms "voluntary sponsor compliance," and "incorporate competency into a definite time frame." Those against these measures gave reasons such as competency testing rarely measures theoretical knowledge and it would be impossible to administer. Several of those opposed indicated that the assessment of skills competency should be the sponsor's decision.

2. Completion Rates

Comment was sought on whether a program's record in completing apprentices can be used as an indicator of its quality. Forty-two percent of the respondents had opinions on this question. Of those, 55 percent responded affirmatively and 36 percent were opposed.

In support, one respondent indicated that completion rates are a good barometer for suggested improvement, but the other variables must be addressed. Many others expressed similar opinions. Completion rates should be measured in context because of the multitude of problems encountered, especially in the construction trades. However, a few respondents said that the program goal should be to graduate all participants.

In general, those opposed were of the opinion that completion rates are just another indicator. Several made the comment that statistics are misleading

because many take jobs as journeyworkers elsewhere. One responded that external factors, rather than course material and time, influence the apprentice's decision whether to complete the trade or to move on to other employment.

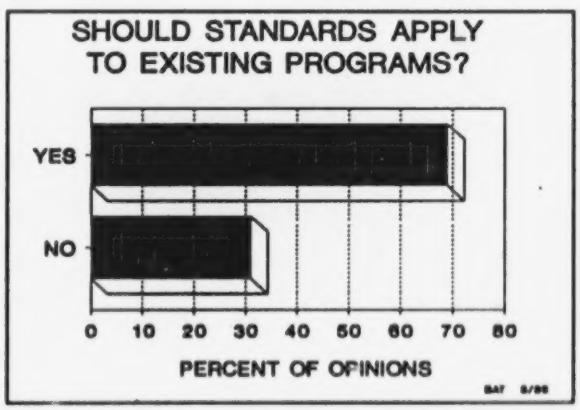
QUALITY ASSURANCE

Comment was requested on mechanisms for ensuring quality in programs and the possible consequences for programs which fail to meet the standards. Comments were sought on program registration procedures and on compliance reviews.

1. Application of Standards

Comment was sought on whether quality standards should be applied to existing programs as well as new programs. In addition, there was a question about whether there should be appeal rights if program registration is denied for failure to meet quality standards. A total of 41 percent of the respondents had opinions on one or more parts of this section.

Thirty-two percent of the respondents commented on the question of applying standards to existing programs, most were in favor of doing so. In support, most commentators stated that standards should be fairly administered and applied to all programs equally. Others thought current programs should be revised to meet new standards, and sponsors should be given a grace period to comply. A few thought that new standards should be encouraged, but not required. Some said that there should be no retroactive standards.



One-third of the respondents commented on whether a new registration should be required if a program is substantially changed. Three-quarters of the opinions were in the affirmative. However, some commentators gave mixed reactions and mentioned voluntary compliance.

Twenty-four percent of respondents addressed the area of an appeals process. The need for appeal rights from unfavorable decisions drew almost unanimous consent.

2. On-Going Oversight

Comments were sought on whether there should be some form of oversight to insure quality, and on the processes that might be used to measure quality. Opinions on penalties for failure to meet quality standards, and on appeal rights, were also invited. Forty-two percent of the respondents had opinions on questions in this section of the focus paper.

Of those respondents who commented on the need for periodic compliance reviews, most were in support of the idea. Among the comments made were the following.

- o The reviews should be more than affirmative action measures.
- o There needs to be a clearly defined process.
- o Politics should be left out of compliance reviews.

Opinions as to who has responsibility for the reviews varied as to whether the BAT or the State should have the responsibility. The suggested period of time between compliance reviews ranged from 1 to 5 years. Suggested penalties for non-compliance included a period of probation and program decertification. In this connection a number of respondents indicated that present staffing is inadequate to conduct better compliance reviews. There was, however, universal agreement that program sponsors should be able to appeal unfavorable review decisions. Sixteen percent of respondents expressed opinions on this point.

PART II

Apprenticeship 2000 Focus Paper On
Support Activities, Linkages and Federal/State Roles

ISSUE I - SUPPORT ACTIVITIES

INTRODUCTION

Issue I discussed the kind of support activities that might be appropriate as a means of overcoming barriers to training. Many of these activities are currently performed by the BAT and the State Apprenticeship Councils (SACs).

Comment was sought on which activities would best support expansion of apprenticeship and how such activities should be performed. In addition, the paper asked whether the mix should be different for expansion under a structured work-place training program.

Most respondents did not differentiate between the "traditional program" and "a structured work-place training program." Of the 11 that did, 36 percent indicated that there should be a different mix of activities. One respondent indicated that "a new program should include new and different instruction such as entry level language and math skills." On the other hand, the remaining 64 percent who made the distinction between programs said specifically that there should not be a different mix of activities.

PROMOTION

Promotion is an activity which has traditionally been a function of government. Promotional efforts at the national, State and local levels have included direct personal contacts, written materials, and to a lesser extent, radio and television public service announcements.

Comment was sought on how important promotion will be in efforts to broaden apprenticeship effectively in both the traditional areas and in new occupations and industries. Fifty-two respondents addressed this topic. In fact, of all the issues and topics that were raised in this paper, Promotion was the issue addressed by most respondents, and the responses were uniformly in agreement that much more promotion of apprenticeship is needed. A representative sample of the comments on this topic included the following.

- o Promotion is vital due to the critical timing of the shortages we are facing.

- o Promotional efforts at State and national level are poor and embarrassing; the concept of apprenticeship is widely misunderstood.

- o Two major groups that need to know more about apprenticeship are employers and youth.

- o Promotion should be everyone's responsibility; the BAT should be the force that gives direction.

TECHNICAL ASSISTANCE

The BAT and SAC staff provide technical assistance to potential and existing program sponsors. Comment was sought as to what should be the objectives of technical assistance in an expansion effort, and whose responsibility it is.

The thirty-four respondents who addressed this topic seemed to be in agreement that technical assistance is needed and that generally such assistance should come from the BAT, or a SAC, or both. Note the following comments.

- o Technical assistance should be provided by the BAT or a SAC to insure compliance with the high standards of apprenticeship.

- o Availability of technical assistance is essential to any apprenticeship program.

- o Continual training of technical staff should play an important role in developing internal BAT expertise in new concepts to be pursued.

REGISTRATION/CERTIFICATION/ACCREDITATION

Currently, the BAT and the SACs register both apprenticeship programs and apprentices. Program sponsors in BAT States, and in some SAC States, receive a registration certificate which certifies that the program meets standards for registration. The apprentice, upon completion, receives a certificate of completion from the BAT, or the SAC, or in some States, both. Thus in effect, there is no single, complete, national registration/certification system for apprenticeship programs. Therefore, comment was sought as to whether current procedures should be changed to provide universal recognition for program sponsors and for individual training results. Also, commentators were asked to consider whether a national system of registration/certification is needed.

Many ideas were expressed by the 32 respondents who addressed this issue and consequently no real consensus surfaced. However, there did seem to be some accord in that several respondents recommended that the apprenticeship system should be as uniform as possible with respect to registration, certification, or accreditation. More specifically, some respondents indicated that a national system of registration is desirable. However, one respondent made the point, "do not think you can nationalize many types of apprenticeship programs especially where licenses come into being; every State or jurisdiction has their own rules and regulations."

SPECIAL RECOGNITION

Comment was sought as to ways of increasing the recognition value of both registration approval and certification of completion that would provide enough additional incentive for employers to develop and register apprenticeship programs. Twenty-two respondents addressed this issue. Of this number, 59 percent felt that some form of special recognition would be desirable. Some felt it was a solid idea while others were lukewarm in their support. Only a few respondents felt that special recognition is not needed. Representative responses included the following.

- National recognition as a selling technique is solid; recognition will also generate enthusiasm for increasing the number of sponsors.
- There should be national awards given for excellence in apprenticeship.
- Implementing a national recognition system for sponsors would not be sufficient enticement for any business to participate in apprenticeship.

DELIVERY SYSTEM

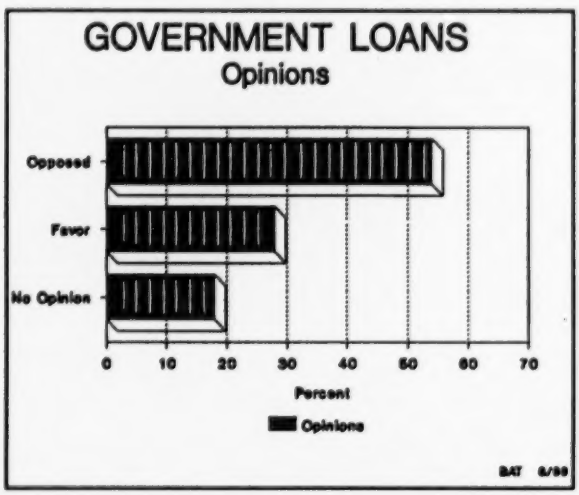
Apprenticeship is an industry-based training program. Private employers either on their own initiative or through a collective bargaining agreement, sponsor apprenticeship programs. Under the JATC model, employers who lack the resources to train on their own can jointly sponsor an apprenticeship program. The lack of such a support structure or delivery system may be a barrier to expansion of apprenticeship. Comment was sought as to whether providing assistance in forming delivery systems is crucial to the expansion of apprenticeship and to the establishment of work-place training programs.

Twenty-eight respondents expressed an opinion about delivery systems. The delivery system mentioned most often, by 39 percent of the respondents, and endorsed as the model to follow was the JATC. However, one respondent felt that the JATC model should not be emulated. Other respondents addressing the issue, offered the following suggestions.

- o Cost should be established and then figure the delivery of training.
- o Emphasis should be on creation of new training programs within whatever delivery systems are available at the time.
- o Assistance with delivery is necessary; one cost effective method to assist with delivery is to develop "turn key" apprenticeship programs.
- o The JATC is a proven method and appears to be the most effective support structure for apprenticeship.

LOANS

Comment was sought as to whether or not employers or associations should receive loans to pay for the initial costs of developing and implementing apprenticeship programs.



Twenty-eight respondents had an opinion about loans. Of these respondents, 54 percent opposed government loans for apprenticeship while 28 percent favored loans. The remaining 18 percent expressed reservations about the idea but were not specifically for or against loans. For example, one respondent was not sure that granting loans would be a benefit or a detriment, because it might create more problems than it would solve -- especially if too many bureaucratic strings are attached.

HELP SUBSIDIZE RELATED INSTRUCTION

Providing related training which pertains to the skills being learned on the job is essential to the success of apprenticeship, and is a requirement for registration. Related instruction is sometimes paid for solely by the State, or in conjunction with Federal vocational education funds. However, who provides

related instruction and who pays for it, varies from State to State. Comment was sought as to whether the costs of related instruction should be subsidized and if so by whom.

This issue was addressed by 31 respondents and there was near unanimity that the subsidization of related instruction would be desirable and/or helpful for the expansion of apprenticeship. Only one respondent expressed some reservation over subsidizing related instruction on the grounds that too much government funding would dilute industry's role in maintaining a qualified workforce. Three respondents specifically identified the Perkins Act as a funding source, one suggested tax incentives, and another suggested that apprenticeship related and supplemental instruction, as well as registration agency funding, could be allocated from employer unemployment insurance taxes. Other respondents favoring subsidization were not specific as to where the funding would come from -- other than to say Federal or State funding.

LOWER COSTS OF DOING BUSINESS

Comment was sought concerning the possibilities for using apprenticeship to lower business costs -- especially in the areas of lower workers' compensation insurance rates.

The nineteen respondents who addressed this issue supported the idea of lower insurance premiums for apprenticeship program sponsors. In this connection other cost saving ideas such as tax credits or the use of existing facilities, such as high schools and/or community colleges for related instruction were mentioned.

CONTRACT PREFERENCE

At times, in specific circumstances, preference in the award of Federal or State contracts has been given to firms that exhibit certain characteristics or undertake certain activities. Comment was sought as to whether preference on certain contracts should be reserved for firms that hire apprentices or structured work-place trainees in certain occupations.

There were 26 respondents to this issue and 24 of them thought that some form of contract preference should be given to apprenticeship program sponsors. However, two respondents opposed the idea of contract preference. One indicated that it would, "mess up the free enterprise system and equal competitive bidding for government work," and the other suggested that, "providing contract preference is discriminating to students, employers, and taxpayers. Preferential treatment could prove too discriminating and too open for political manipulation."

OTHER SUPPORT ACTIVITIES

Respondents were asked for suggestions for other support activities, in addition to the ones identified above, that might be effective in overcoming barriers to expansion.

Twenty-nine respondents mentioned "other support activities" which they felt would be effective in overcoming barriers to expansion. The following are representative:

- o Provide tax advantages for employers that sponsor apprenticeship programs;
- o Make it mandatory for employers in targeted trades to sponsor apprenticeship;
- o Provide more financial support from government;
- o Establish pre-apprenticeship within the high school system;
- o Initiate a Speakers Bureau controlled by State BAT representatives to speak at local business luncheons, Chambers of Commerce, Lions, Elks, etc.;
- o Establish a technical training institute to be run by the Department of Education; and
- o Appoint a representative from the vocational education system to serve as an apprenticeship liaison in each State.

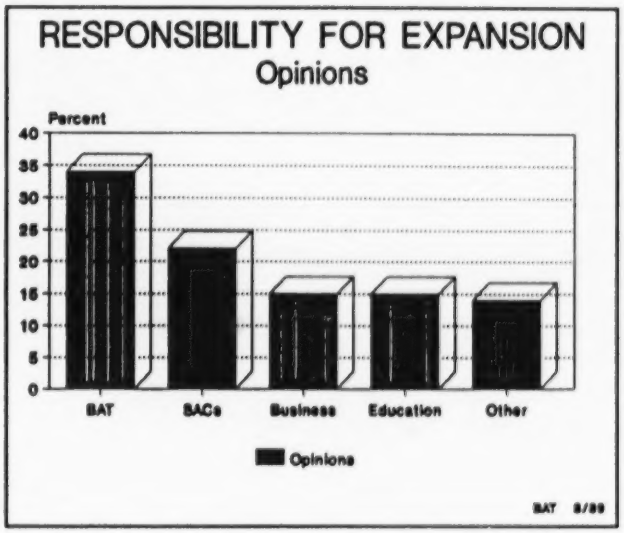
Of the "other" support activities mentioned, tax incentives or some other form of financial assistance was mentioned most frequently.

PERFORMANCE OF SUPPORT ACTIVITIES

In addition to asking about specific support activities, the paper asked who should undertake the various activities necessary for expansion. Among the possibilities suggested were the BAT, SACs, Education, and Business. A question was also asked on how these activities should be implemented.

Thirty respondents expressed 67 opinions on the subject of support activities. Some respondents identified more than one entity to undertake the various activities necessary for expansion.

Of the sixty-seven opinions that were expressed on this subject, 34 percent of the opinions felt that the BAT should undertake the various activities necessary for expansion, while 22 percent thought the SACs should. In addition, 15 percent thought it was business' responsibility while a like amount felt it was education's responsibility to undertake activities to support expansion.



However, many of the respondents believed that the activities should be a shared responsibility among all of the above organizations. The remaining opinions (14 percent) varied, and identified organizations such as the Department of Commerce, local Employment Service offices, and local JATCs as agencies which should undertake these activities.

Only five of the respondents expressed an opinion as to how these activities should be implemented. One such respondent suggested, "Target new occupations and industries according to a set of pre-determined criteria; select, design and coordinate support activities and linkages based on objectives derived from common, yet specific needs of each target group; and employ the success/failure experiences and trends established during previous phases to limit scope of expansion and enhance future opportunities."

ISSUE II - LINKAGES

INTRODUCTION

Apprenticeship programs over the years have developed linkages with other programs, particularly with the education system, and also with other parts of the employment and training system. Although there are many creative apprenticeship linkages with a variety of organizations, these linkages have not been universally adopted.

Apprenticeship linkages are conceivable with a great number, and variety of organizations at State and local levels. The kinds of linkages that can develop and flourish will depend on the purpose, perspective and leadership of existing organizations. Linkage activities should increase the ability of apprenticeship programs both to produce skilled workers and to serve populations that are different from the current apprenticeship populations.

Public comment was sought on the degree to which strengthened or additional linkages are needed to improve or expand apprenticeship programs and on how such linkages should be undertaken.

Forty-nine respondents expressed 65 opinions on the subject of linkages. Again, some respondents identified more than one entity with whom to develop linkages.

Of the sixty-five opinions expressed on this subject, 15 percent suggested that linkages with vocational education be strengthened.

Twenty percent of the opinions suggested that greater linkages with education (Federal and/or State level) are needed. Illustrative comments included the following.

- Educational linkages should be improved, increased and strengthened as the single most important and largest market for development and expansion of apprenticeship.

- Linking apprenticeship and cooperative education at both secondary and post-secondary educational levels should be strongly supported.

- A clear operating linkage between the Department of Labor and the Department of Education should be established.

The remaining 65 percent of opinions identified such varied organizations as the Job Corps, JTPA, Community College System, Chamber of Commerce, National Alliance of Business, State Job Service, Community Service Centers, Business Roundtables, Apprenticeship Information Centers, Industry and Employer Associations, Marketing Statistical Research Groups, Employment Development Agencies, Private Industry Councils, High School Counselors, National Trade Advisory Committees, Women and Minority Organizations, Vocational Industrial Clubs of America, and Trade Schools, as desirable organizations for linkages with apprenticeship.

Six respondents specifically commented on how the linkages should be undertaken. Their suggestions included the following.

- Money from the Job Training Partnership Act should be earmarked for apprentice linkage development.

- The requirement of apprentices on all federally funded projects should be mandated to insure that training actually occurs.

- Before additional linkages can be created there must be a nationally organized promotional campaign explaining benefits and need for having a trained work force through apprenticeship.

- There should be a provision in Federal legislation which would adequately fund such a program.

- Financial support, if available, should be provided on a matching basis to State Departments of Education, and large school districts, for special staff to develop and maintain linkage programs.

Comment was also sought as to what other organizations would be most important to the improvement and expansion of apprenticeship, and what should be the nature of the apprenticeship system's relationship with them. Thirteen respondents addressed these questions. Suggestions included the following organizations: Employer Groups; Employment and Training Division of the American Vocational Association; National Employment and Training Association, Job Training Partnership System; Community Based and Women's Organizations; American Society for Training and Development; Trade Associations; and Manufacturer's Representatives in Business and Industry.

ISSUE III - FEDERAL/STATE ROLES

INTRODUCTION

Administration of the national apprenticeship system is a mix of solely Federal, joint Federal-State, or mostly State administration. In 23 States, the BAT directly administers apprenticeship. In 27 States where direct administration of apprenticeship is delegated to a State agency, the role of the BAT varies widely, from only minimal involvement in some State activities to a very substantial role in others.

The paper discussed the current Federal/State apprenticeship system and posed a series of questions about how it might be strengthened. Comments were requested in response to each area, as well as other observations on appropriate Federal/State roles. These questions were asked within the context of an expanded apprenticeship and training system.

MINIMUM STATE LEVEL

Current Federal regulations do not prescribe any minimum level of State activity required for recognition. In several States, the SAC serves essentially as a registration agency, with BAT staff performing all the administrative functions. Some observers maintain that this practice adds a cumbersome layer of bureaucracy with no real benefit to the program sponsors or to the apprentices. Accordingly, comment was sought as to whether there should be minimum requirements for the level of State effort as a condition of recognition by the Secretary.

Twenty-seven respondents addressed this issue. Almost all of the respondents thought there should be minimum requirements for the level of State effort as a condition of recognition by the Secretary. Typical responses included the following.

- o There should be a State minimum requirement.
- o Minimum levels should be set by the Secretary and BAT alone.
- o It is appropriate and highly desirable to establish minimum requirements. Minimum requirements should be applied as a condition of Federal recognition.
- o Each State would have an apprenticeship law conforming to minimum Federal statutory standards, but providing for matters unique to that State.

PARTICIPATION BY ALL STATES

Several respondents to the broad issue on the role of government suggested establishing a Federal-State apprenticeship system modeled after the Federal-State Unemployment Insurance (UI) system. Comments were sought as to whether a Federal-State apprenticeship system, modeled after the UI system, or some other model, in which all States participate is a desirable goal. If so, what should be the minimum Federal requirements for State participation?

Thirty-seven respondents addressed this question. Most respondents indicated that it was "desirable" to have all States participate in the apprenticeship system. Only a few indicated that it was not. Among the specific comments made were the following.

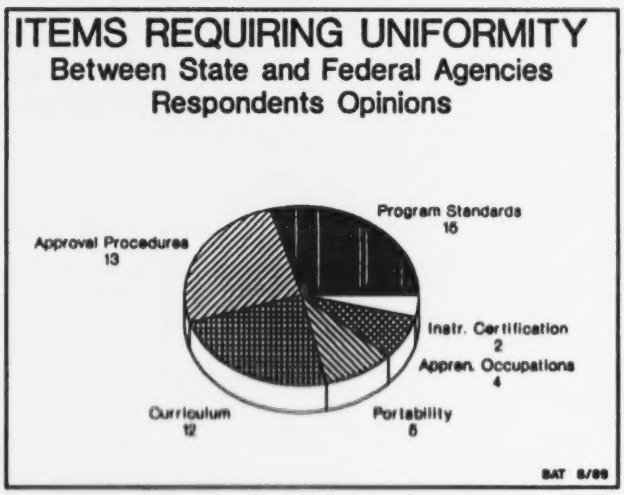
- The UI system would be an excellent model to use for the Federal/State apprenticeship system.
- The BAT should encourage each State to form a State Apprenticeship Council to promote, register and certify programs on a statewide basis.
- Every State should have a State-administered apprenticeship program with appropriate technical staff.
- Participation by all States in a Federal/State apprenticeship system is desirable.
- It needs to be understood that apprenticeship is not a government program.
- Care should be taken to avoid any unnecessary Federal and/or State intrusion, intervention, or control beyond those of support, technical assistance, and oversight.
- All States should participate -- a goal which could be brought about by Federal legislation.

A few respondents had suggestions for minimum requirements for State participation. For example, one respondent suggested that a State should be required to have a minimum staff level. Two respondents suggested that the State budget or funding consideration should constitute the minimum requirements, while one other respondent felt that legislation and regulations should define, and set forth, the minimum national requirements.

CONSISTENCY AMONG STATES

This paper also questioned if there is a need to have more uniformity among the States in apprenticeship program operations, or if the unique economic environment of each State justifies diversity. If uniformity among States was deemed to be important to the respondents, comment was sought as to which areas uniformity is most important, i.e., apprenticeable occupations, program standards, program registration and approval procedures, curriculum, or other areas.

Forty-two respondents addressed this issue. Of that number, 88 percent thought that uniformity among States is important and only 12 percent thought that such uniformity was not important. The chart illustrates the areas deemed most important by the respondents expressing opinions on the issue.



The reasons that respondents gave for supporting consistency varied widely. For example, following are some of the representative thoughts expressed to support uniformity.

- Uniformity is vital in apprenticeship.
- Uniformity is important because workers frequently move from State to State.
- Consistency is important, but probably not possible if left up to various State governments and their political policies.
- Consistency among States in all areas of apprenticeship is necessary.
- Consistency is necessary to assure that the minimum standards are being met among States.
- Uniformity among States is important; a national advisory board should determine in what areas uniformity is most important.

PROCEDURAL SAFEGUARDS

Current Federal regulations do not provide for potential program sponsors to be advised of the reasons for denial of program registration. There are no appeal rights for potential program sponsors in BAT States or in many SAC States.

The right to appeal an adverse finding is basic to most government programs. Comment was sought as to whether such procedural safeguards should be included in apprenticeship programs.

Twenty-nine respondents addressed this question and they were unanimous in their opinion that there should be procedural safeguards. No one who responded to this issue thought that there should not be procedural safeguards.

OVERSIGHT

The BAT conducts annual compliance reviews of SAC operations for consistency with Federal regulations. The Secretary of Labor may derecognize a SAC which fails to comply with Federal regulations, after opportunity for corrective action.

In fact, involuntary derecognition of a SAC has never occurred and comment was sought as to whether such derecognition is too strong a tool for fostering compliance. Commentators were also asked to identify other options to foster compliance and the impact of such options on the national apprenticeship system.

Twenty-five respondents expressed 44 opinions on the subject of oversight. Here again, some respondents had more than one idea as to how oversight should be undertaken.

Of the 44 opinions, 25 percent suggested that derecognition is an appropriate sanction to foster SAC compliance with Federal regulations. However, while derecognition was not thought to be too strong a tool for fostering compliance, several respondents indicated that it should be used only "as a last resort," or should "only occur after all else has failed."

Twenty-three percent of the opinions thought that periodic certification is a good idea and a desirable goal but, 7 percent thought that it, "should not be undertaken" or "should be avoided." Of those endorsing periodic certification, one suggested that "SACs should be given recognition for 4 years. Prior to the expiration time SAC will be required to resubmit application for new certificate." Another respondent suggested, "Recertification hearings, open to the public, should be held every five years."

Only 11 percent of the opinions expressed thought that the State law should be reviewed regularly, while two percent indicated that such review of State law and regulation is unnecessary.

Following are other suggestions to foster compliance, included in the remaining 32 percent of opinions expressed by respondents.

- The BAT can best foster compliance of the SACs by requiring that all State funds allocated for SAC administration be controlled by a State governing committee appointed by the governor.
- Federal legislation and regulation need to be updated to reflect current labor market demands, and clarify State and Federal roles.
- Efforts should be undertaken to build better relationships between BAT and SACs.
- Oversight is best controlled by Federal retention of the program certification process.
- Rules and regulations should be in language a lay person can understand.
- Periodic training sessions should be held on the Federal level to iron out any deviations or misunderstandings.
- The Federal Committee on Apprenticeship should be active in discussion of apprenticeship materials and also be allowed to comment on the idea of a quasi-governmental organization whose goals would be the promotion of a modern national apprenticeship system.
- The BAT should become the exclusive registration agency.

OTHER

Suggestions have been made that additional efforts are needed to clarify respective responsibilities in States where apprenticeship is jointly administered by the BAT and the SAC. In 25 of the 27 SAC States, responsibilities are established in written agreements. However, many of these agreements may be little more than a paper exercise. Comments were sought as to what more should be done to clarify the Federal/State roles.

Thirteen respondents offered suggestions to clarify the Federal-State roles. Some of their suggestions follows:

- Legislation is necessary to clarify and confirm Federal-State roles. The National Apprenticeship Act does not provide adequate guidance.

- Joint conferences for BAT and NASTAD should be held to discuss program policy.

- Federal law should require that State agencies administering apprenticeship be within State Departments of Labor or whatever agency is charged with the responsibility for enforcing State wage and hour laws.

- In SAC States, the Federal role should be limited to operations review, compliance, oversight, general promotion and information; specific detailed working agreements should be executed defining Federal/State roles in each State.

- The greatest negative in the State and Federal system is the inability to always place the welfare of the apprentice first.

- Legislation is necessary to clarify and confirm Federal/State roles. The National Apprenticeship Act is too brief and too old to provide guidance required. The meaning of this term -- "for Federal purposes?" has never been defined. It needs prompt clarification so all parties can realize their roles and responsibilities.

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